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*Tasha Teherani-Ami, in her capacity as the Trustee of  
the Sonja Dinihanian GST Trust DTS 01/01/11*

UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF OREGON

In re  
15005 NW CORNELL LLC, and  
VAHAN M. DINIHANIAN, JR.  
Debtors.<sup>1</sup>

Bankruptcy Case Nos.  
19-31883-dwh11 (Lead Case)  
19-31886-dwh11  
Jointly Administered Under  
Case No. 19-31883-dwh11

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: 15005 NW Cornell LLC (5523) and Vahan M. Dinihanian, Jr. (0871) (Case No. 19-31886-dwh11)).

1  
2 15005 NW CORNELL LLC, an Oregon  
3 limited liability corporation,

4 Plaintiff,

5 v.

6 TASHA TEHERANI-AMI, IN HER  
7 CAPACITY AS THE TRUSTEE OF THE  
SONJA DINIHANIAN GST TRUST DTS  
01/01/11,

8 Defendant.

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10 Adv. Proc. No. 20-03079-dwh

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13  
14 **STIPULATED MOTION FOR EXTENSION  
OF TIME TO FILE SUMMARY  
JUDGMENT MOTIONS**

15  
16 **MOTION**

17 Counsel for plaintiff 15005 NW Cornell LLC (“**Cornell**”) and defendant Tasha Teherani-Ami, in  
18 her capacity as the Trustee of the Sonja Dinihanian GST Trust DTS 01/01/11 (the “**Trust**,” and together  
19 with Cornell the “**Parties**”) respectfully move the Court to enter an Order in the form of the attached  
20 (Exhibit 1) on a stipulated basis, extending the deadline for the Parties to file Summary Judgment  
21 Motions from August 3, 2021 to August 5, 2021.

22 In support of this motion, the Parties assert the following:

23 1. On June 29, 2021, the Court held a Continued Pretrial Conference at which the Parties  
24 agreed, as reflected in the Record of Proceeding (Dkt. 20), that Summary Judgment Motions would be  
25 filed on or before August 3, 2021.

26 2. The Parties have discussed the deadline and have mutually agreed the date should be  
extended by two days, from August 3, 2021 to August 5, 2021 and to respectfully convey that request on  
a stipulated basis to the Court.

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1           3. The Parties agree the remainder of the briefing and hearing schedule should remain the  
2 same.

3           IT IS SO STIPULATED.

4           Dated: August 3, 2021

**PERKINS COIE LLP**

5           By: /s/ Douglas R. Pahl

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13          Counsel for Plaintiff and Debtor  
14          *15005 NW Cornell LLC*

15          DATED: August 3, 2021

**WYSE KADISH LLP**

16          By: /s/ Bruce H. Orr

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24          Counsel for Defendant and Creditor  
25          *Tasha Teherani-Ami, in her capacity as the*  
26          *Trustee of the Sonja Dinihanian GST Trust DTS*  
27          *01/01/11*

# **EXHIBIT 1**

UNITED STATES BANKRUPTCY COURT

## FOR THE DISTRICT OF OREGON

In re

15005 NW CORNELL LLC, and

VAHAN M. DINJHANIAN, JR.

Debtors.<sup>1</sup>

15005 NW CORNELL LLC, an Oregon limited liability corporation,

**Plaintiff,**

V.

TASHA TEHERANI-AMI, IN HER  
CAPACITY AS THE TRUSTEE OF THE  
SONJA DINIHANIAN GST TRUST DTS  
01/01/11,

**Defendant.**

Bankruptcy Case Nos.  
19-31883-dwh11 (Lead Case)  
19-31886-dwh11  
Jointly Administered Under  
Case No. 19-31883-dwh11

Adv. Proc. No. 20-03079-dwh

**ORDER GRANTING STIPULATED  
MOTION FOR EXTENSION OF TIME  
TO FILE SUMMARY JUDGMENT  
MOTIONS**

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: 15005 NW Cornell LLC (5523) and Vahan M. Dinihanian, Jr. (0871) (Case No. 19-31886-dwh11)).

1           THIS MATTER came before the Court on plaintiff 15005 NW Cornell LLC (“**Cornell**”) and  
2 defendant Tasha Teherani-Ami’s, in her capacity as the Trustee of the Sonja Dinihanian GST Trust DTS  
3 01/01/11 (the “**Trust**,” and together with Cornell the “**Parties**”) Stipulated Motion for Extension of  
4 Time to File Summary Judgment Motions (the “**Motion**”). The Court having reviewed the Motion, and  
5 being otherwise duly advised, now, therefore,

6           IT IS HEREBY ORDERED as follows:

7           1.       The deadline for the Parties to file Summary Judgment Motions is extended to August 5,  
8 2021.

9                                  ###

10           Presented By:

11           **PERKINS COIE LLP**

12           By: /s/ Douglas R. Pahl

13           Douglas R. Pahl, OSB No. 950476  
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23           15005 NW Cornell LLC

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PAGE 2- ORDER GRANTING STIPULATED MOTION  
FOR EXTENSION OF TIME TO FILE  
SUMMARY JUDGMENT MOTIONS

153316194.1

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Exhibit 1  
Page 2 of 3

1  
2       **WYSE KADISH LLP**  
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4       By: /s/ Bruce H. Orr  
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14       *Tasha Teherani-Ami, in her capacity as the*  
15       *Trustee of the Sonja Dinihanian GST Trust DTS*  
16       *01/01/11*

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PAGE 3- ORDER GRANTING STIPULATED MOTION  
FOR EXTENSION OF TIME TO FILE  
SUMMARY JUDGMENT MOTIONS

153316194.1

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Exhibit 1  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the date set forth below they caused the foregoing

**STIPULATED MOTION FOR EXTENSION OF TIME TO FILE SUMMARY JUDGMENT**

**MOTIONS** to be served via the CM/ECF system on the parties set forth below:

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01/01/11

Counsel for Debtor  
*Vahan M. Dinihanian, Jr.*

Dated: August 3, 2021

PERKINS COIE LLP

By: /s/ *Douglas R. Pahl*

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